

**FILED**  
HARRISBURG, PA

FEB 21 2023

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF PENNSYLVANIA**

PER MA  
DEPUTY CLERK

IN RE APPLICATION OF  
PENNLIVE, YORK DAILY  
RECORD, AND YORK DISPATCH  
TO UNSEAL COURT RECORDS

) No. 1:22-MC-756

) (Magistrate Judge Schwab)

**NOTICE REGARDING ORDER OF FEBRUARY 7, 2023**

The United States of America hereby notifies the Court that it does not intend to file objections to the Court's Order dated February 7, 2023. *See* ECF No. 25. The Government understands that the Court will file on the public docket the redacted versions of its opposition to Applicants' application to unseal court records and its reply in support of the Government's motion to seal attached to the February 7, 2023 Order.

The Government respectfully requests that, prior to filing on the public docket, the Court consider making three additional limited, targeted redactions:

- Redacting the phrase "Rep. Perry and others" from the top of page ten of the Government's opposition brief. If left unredacted, that clause could be understood to suggest that Rep. Perry is the target of an ongoing investigation (as opposed to a subject or witness) or

that the sealed warrant materials do, in fact, implicate him in criminal activity.

- Redacting two phrases that appear to confirm a separate search warrant that the Government has not publicly acknowledged, and that is the subject of ongoing sealed litigation in the D.C. Circuit:
  - The phrase “before the government has even had the opportunity to review the information obtained pursuant to the search warrant” in the middle of page eight of the Government’s opposition brief; and
  - The phrase “including a subsequent warrant” in the middle of page eight of the Government’s opposition brief.

The D.C. Circuit has scheduled argument in that matter on February 23, 2023. Should the fact of the second warrant become public during that hearing, the Government will withdraw its request for additional redactions related to the second search warrant.

Dated: February 21, 2023

Respectfully submitted,

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/s/ Leslie Cooper Vigen

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